

Superfund Records Center

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ROPES & GRAY

225 FRANKLIN STREET
BOSTON, MASSACHUSETTS 02110

(617) 423-6100

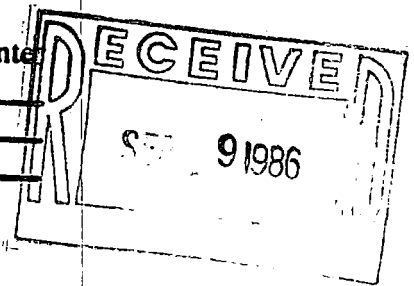
TELEX NUMBER 940519 ROPGRALOR BSN

TELEX NUMBER 951973 ROPES GRAY BSN

TELECOPIERS: (617) 423-2377

(617) 423-7841

INTERNATIONAL: (617) 423-6905



IN WASHINGTON

1001 TWENTY-SECOND STREET, N.W.

WASHINGTON, D.C. 20037

(202) 429-1600

TELECOPIER: (202) 429-1629

August 19, 1986

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REGION I

OFFICE OF REGIONAL COUNSEL

HAND DELIVER

E. Michael Thomas, Esq.
Senior Assistant Regional Counsel
United States Environmental Protection Agency,
Region I
J. F. Kennedy Federal Building
Boston, Massachusetts 02110

Re: Section 104(e) Response of CIBA-GEIGY Corp.
Regarding the Cannons Engineering Corp. Sites

Dear Mr. Thomas:

By letter dated May 14, 1986, CIBA-GEIGY Corporation provided a complete response to the request made by Region I of the United States Environmental Protection Agency ("EPA"), pursuant to Section 104(e) of CERCLA and Section 3007(a) of RCRA, for information regarding the Cannons Engineering Corporation Sites in Bridgewater, Plymouth, Londonderry and Nashua.

As was indicated in that letter, CIBA-GEIGY conducted a thorough review of CIBA-GEIGY's records and engaged in discussions with CIBA-GEIGY employees in order to identify and locate any documents which might be responsive to EPA's request. All materials which were identified by CIBA-GEIGY as being responsive to EPA's request were copied and provided to EPA under separate cover.

CIBA-GEIGY accordingly takes the position that it has completely satisfied the Agency's request for information. Neither Section 104(e) of CERCLA, nor Section 3007(a) of RCRA, authorize the Agency to require the submission of an affidavit. Consequently, CIBA-GEIGY does not consider the submission of an affidavit to be a necessary element of its



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response. CIBA-GEIGY's written statement that a thorough search was conducted in response to the Agency's request for information is sufficient.

In the event that the Agency continues to maintain that an affidavit is required, please contact me at (617) 423-6100 to discuss this matter further.

Very truly yours,

John P. Dennis (las)

John P. Dennis

JPD:las

cc: George Dana Bisbee, Esq.
Gregory C. Wilson, Esq.
Patricia Stavola, Esq.